



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

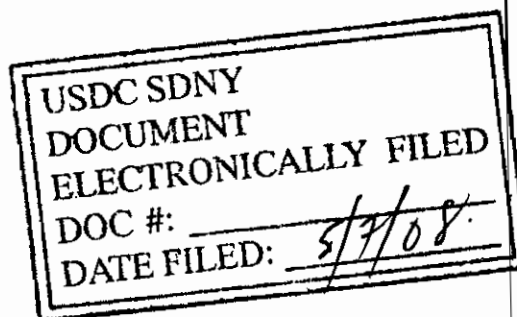
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May 5, 2008

**BY FACSIMILE**

The Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl St., Room 540  
New York, New York 10007  
Fax: 212-805-7941



Re: Tyrone Ford v. City of New York, et. al., 08-cv-02412 (LAP) (KNF)

Your Honor:

As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights action, I write to respectfully request that defendant's City of New York time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days from May 6, 2008 to and including July 7, 2008.<sup>1</sup> Plaintiff's counsel consents to this request.

As background, the complaint alleges, *inter alia*, that on January 19, 2006, plaintiff was falsely arrested, subsequently maliciously prosecuted and falsely imprisoned until May 7, 2007.<sup>2</sup> As a threshold matter, an enlargement of time will allow this office to forward to

<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Katherine E. Smith, who is presently awaiting admission to the bar and is handling this matter under supervision. Ms. Smith may be reached directly at (212) 513-0462.

<sup>2</sup> In addition to the City of New York, plaintiff names officers James Vanacore and Under Cover Police Officer 12941 as defendants. Upon information and belief, the officers have not been served with a copy of the summons and complaint in this action. Without making any representations on their behalf, assuming service was properly effected, it is respectfully requested that their time to respond to the complaint be similarly enlarged so that their defenses are not jeopardized while representational decisions are being decided.

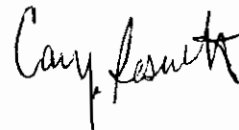
plaintiff for execution authorizations for the release of the underlying arrest, criminal prosecution and medical records. Defendant cannot obtain these records without the authorizations, and without the records, defendant cannot properly assess this case or respond to the complaint. Accordingly, defendant requires this enlargement so that this office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill its obligations under Rule 11 of the Federal Rules of Civil Procedure.

No previous request for an enlargement of time has been made. Accordingly, this office respectfully requests that defendant's City of New York time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days from May 6, 2008 to and including July 7, 2008.

I thank Your Honor for considering the within request.

*So ordered*  
*Loretta A. Haska*  
*USDC*  
*May 6, 2008*

Respectfully submitted,



Caryn Rosencrantz (CR 3477)  
Assistant Corporation Counsel  
Special Federal Litigation Division

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